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USDOC FOR 532/OEA/PLUDD  
USDOC FOR 3132 FOR FCS/OIO REGIONAL DIRECTOR PATRICK SANTILLO  
BICE FOR OFFICE OF STRATEGIC INVESTIGATIONS

SIPDIS

E.O. 12958: N/A

TAGS: [BMGT](#) [BEXP](#) [HK](#) [ETRD](#) [ETTC](#)

SUBJECT: EXTRANCHECK: PRE-LICENSE CHECK: HIGH TECH INTERNATIONAL

REF: A) BIS e-mail PLC request dated October 23, 2009 - 01110086 B)  
D425476

¶1. Unauthorized disclosure of the information provided below is prohibited by Section 12C of the Export Administration Act.

¶2. As per refTel A request and at the direction of the Office of Enforcement Analysis (OEA) of the USDOC Bureau of Industry and Security (BIS), Export Control Officer Philip Ankel (ECO), attempted to conduct a pre-license check at High Tech International Holdings Limited, Tower A, New Trade Plaza, 6 On Ping Street, Shatin, Hong Kong (High Tech). The purpose of the visit was to determine the suitability of High Tech to be the ultimate consignee and end user of a Tracklink 5000MA USBL tracking system that is the subject of license application D425476. The item (ECCN 6A001) is controlled for national security (NS) reasons. The license applicant is Linkquest Inc., of San Diego, California.

¶3. A search of the Hong Kong Companies Registry reveals that High Tech has been in existence since 2006. Its registered capital is the Hong Kong equivalent of USD 1. Its sole director is listed as Ng, Ching Yu (with Hong Kong Identification number G482478(3). Internet research reveals that High Tech's address also appears to be the address of a range Russian companies with offices in Hong Kong including Advonics ([www.advonicsgroup.com](http://www.advonicsgroup.com)) which is a supplier of electronic components with offices in Hong Kong, Shenzhen and Saint-Petersburg. ECO does not believe that High Tech maintains a physical office in Hong Kong.

¶4. High Tech does not appear to have a web site. Correspondence with the representative of High Tech (namely Mr. Alik Nemchinov) was received from a gmail account.

¶5. Mr. Nemchinov stated in his e-mail correspondence that he works for High Tech as its regional manager and will not be in Hong Kong for some time. He further stated that the item would be used by the Russian Far Eastern National University (consistent with the information in the underlying license application). When ECO requested an in-person meeting in Hong Kong with the director of the company, namely Ng, Ching Yu (the signatory on the end-user statement supporting the license application), Mr. Nemchikov responded that this was his company's first experience receiving so many questions about what he described as a absolutely normal deal. He then stated that he believed that High Tech should not proceed with the transaction and would inform the client of this fact. On November 13, 2009, Mr. Nemchikov informed ECO that he had spoken with the client and they had decided to cancel this order.

¶6. Based on the information detailed herein, ECO does not believe High Tech to be a suitable recipient of controlled U.S. origin technology.

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